

FILED

2015 APR 14 PM 2:15

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KELLY C. HOOD,

Defendant.

) I N F O R M A T I O N

)  
)  
)  
)  
) CASE NO.

**1 15 CR 143**

Title 31, United States Code,  
Sections 5324(a)(1) and (3)

**JUDGE OLIVER**

The United States Attorney charges:

**Count 1**

(Structuring, Title 31 U.S.C. § 5324(a)(1) and (3))

At all times material herein, unless otherwise indicated:

1. Defendant KELLY C. HOOD ("HOOD"), along with Jerry A. Cicolani, Jr. ("Cicolani"), an individual known to the U.S. Attorney but not charged herein, was a licensed registered representative with PrimeSolutions Securities, Inc. ("PrimeSolutions").
2. Kenneth A. Grant ("Grant") and T.A., individuals known to the U.S. Attorney, but not charged herein, owned and operated KGTA Petroleum, Ltd. ("KGTA"), which operated in the Northern District of Ohio, Eastern Division, and elsewhere.
3. Grant, T.A., and others, marketed KGTA to investors as a petroleum company that earned profits from buying and reselling various crude oils and refined fuel products.

4. Grant solicited the assistance of Cicolani to recruit investors to KGTA. In order to conceal the scheme from his employer, Cicolani requested that his monthly fees not be paid directly, but be paid to HOOD, an entity registered to HOOD called Turnbury Consulting Group, LLC, and an entity controlled by Cicolani called White Pond Wealth Management.

5. Cicolani received in excess of \$5,000,000 in commission fees from KGTA, payable to Turnbury Consulting Group and White Pond Management for the sale of unregistered securities.

6. In or around March 2014, the SEC issued subpoenas to HOOD and Cicolani requesting documentation, including, but not limited to: (1) sources of income; (2) payments received from KGTA to any family member or entity with an ownership interest, signatory authority, or beneficial interest; and, (3) financial institution accounts with an ownership interest, signatory authority, or beneficial interest.

7. HOOD, at the direction of Cicolani, knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, did structure and attempt to structure the following transactions with two financial institutions, which represented criminally derived property from the Northern District of Ohio, to wit: commission fees paid to HOOD and Cicolani for the sale of unregistered securities in KGTA in the Northern District of Ohio, and elsewhere:

<b>Account</b>	<b>Date</b>	<b>Transaction Type</b>	<b>Amount</b>
HOOD Fifth Third #8986	5/19/2014	Cash Withdrawal	\$10,000.00
HOOD FNB of Gulf Coast #1817	5/19/2014	Cash Withdrawal	\$10,000.00
HOOD Fifth Third #8986	5/21/2014	Cash Withdrawal	\$10,000.00
HOOD FNB of Gulf Coast #1817	5/21/2014	Cash Withdrawal	\$10,000.00
HOOD Fifth Third #8986	5/23/2014	Cash Withdrawal	\$10,000.00
HOOD FNB of Gulf Coast #1817	5/23/2014	Cash Withdrawal	\$10,000.00
HOOD Fifth Third #8986	5/27/2014	Cash Withdrawal	\$10,000.00
HOOD FNB of Gulf Coast #1817	5/27/2014	Cash Withdrawal	\$10,000.00
HOOD Fifth Third #8986	5/28/2014	Cash Withdrawal	\$10,000.00

HOOD FNB of Gulf Coast #1817	5/28/2014	Cash Withdrawal	<u>\$10,000.00</u>
		Total	\$100,000.00

All in violation of Title 31, United States Code, Sections 5324(a)(1) and (3).

STEVEN M. DETTELBACH

United States Attorney

By:



Ann C. Rowland

Deputy Criminal Chief